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A small logo consisting of a circle with the letters "E" and "A" inside, followed by the words "Equal Opportunity" and "Affirmative Action".

November 23, 2021

BY ECF & E-MAIL

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: *Kraiem v. Jones Trading Institutional Services, LLC., et al.*,
19-CV-5160 (ALC)

Dear Judge Carter:

This firm represents Plaintiff Nefissa Kraiem in the above-referenced action. We write on behalf of the parties and in response to your November 15, 2021 Order (Dkt. No. 132), in which Your Honor directed the parties to file a joint status report including, at a minimum, proposed answer deadlines for the remaining defendants. After meeting and conferring, the parties respectfully request that they be permitted leave to proceed as follows:

- On or by December 3, 2021, Plaintiff will provide Defendants with a proposed Second Amended Complaint, conforming to this Court's September 30, 2020 Opinion and Order on Defendants' Motion to Dismiss the First Amended Complaint (Dkt. No. 74) and the Court's May 26, 2021 Order on Plaintiff's Motion for Leave to Amend the First Amended Complaint (Dkt. No. 95); and
- On or by December 10, 2021, Defendants will inform Plaintiff whether they consent to the filing of the proposed Second Amended Complaint. If Defendants consent to the filing of the Second Amended Complaint, Plaintiff will file same, and Defendants will answer within 30 days thereafter. If Defendants do not consent to the filing of the Second Amended Complaint, the parties will meet and confer to attempt to resolve any disputes, and request a conference with the Court, if necessary.

In addition to the above, the parties jointly request that the Court schedule a settlement conference at its earliest convenience.

The Court's considerations are greatly appreciated.

Respectfully submitted,

/s/
Zachary R. Bergman

Honorable Andrew L. Carter, Jr.

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cc (by ECF and E-mail): Joan M. Gilbride, Esq.
Esther Berkowitz Feuer, Esq.